

**DECLARATION OF RANDY L. PRITCHETT**

I, Randy L. Pritchett, hereby submit the following Declaration, under penalty perjury, based upon my personal knowledge of the following facts:

1. My name is Randy Pritchett. I am employed by Cuyahoga County as a Correction Officer at the Cuyahoga County Corrections Center ("CCCC"). I have been employed as a Correction Officer since April of 1998.
2. Over the more than two decades of time I have served as a Correction Officer, I have attended formal trainings in: Correction Officer Basic 120 Hour Training; Use of Force, Body Searches - Clothed and Unclothed; Report Writing; CPR; Basic Security Duties; Sexual Harassment and Abuse in Corrections; First Aid; Suicide Prevention - Detection, Interventions and Response; Fire Safety; Inmate Abnormal Behavior - the Officer's Responsibility; Inmate Supervision - the Role of the Correction Officer Fights, Riots and Disorders; Corrections Officer Safety and Liability Awareness; Creating and Maintaining a Positive Work Environment through the National Institute of Corrections. See Exhibit 1, which are my formal training records kept by Cuyahoga County.
3. My primary responsibilities involve maintaining security of the jail, ensuring inmate safety, proactively engaging with inmates to reduce the incidences of fighting and

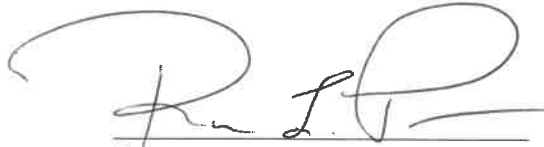
other disturbances amount the inmate population, observing and influencing inmate behavior, conducting inspections for contraband, weapons and facility damage and ensuring Correction Officers follow all policies and procedures of the CCCC.

4. On December 10, 2018, I was on duty as a Corporal, serving as a first-line supervisor of the Correction Officers, within the CCCC.
5. While on duty on December 10, 2018, I responded to an altercation between Inmate Fatima Suleiman and Inmate Tabitha Jackson. When I arrived at the scene of the incident, Correction Officers Kimberly Brown-Wiggins and Nancy Muszynec had separated both inmates. See Exhibit 2 and Exhibit 3, which are Combination reports prepared by Officers Muszynec and Brown-Wiggin. As the Corporal who responded to the situation, I signed the reports as the supervisor on duty and the supervisor who ensured that both inmates were seen by medical following an incident, consistent with procedures involving assaults between inmates.
6. After the threat of further violence was neutralized, inmate Jackson was seen in medical, where Nurse Zitello checked her vitals and completed a physical examination. Inmate Jackson was cleared to returned to her housing unit. See Exhibit 1. I did not observe any injuries on inmate Jackson.
7. Inmate Fatima Suleiman was also seen in medical. See Exhibit 1. Upon medical's examination of Inmate Suleiman, it was determined that Inmate Suleiman's injuries required treatment at Metrohealth systems. See Exhibit 1. Inmate Suleiman was transported to Metrohealth system by EMS.

8. I am aware of the Plaintiff in the *Jackson* case allegations against me regarding the incident that occurred on December 10, 2018 within the Cuyahoga County Correction Center.

9. I did not slam Inmate Jackson into a desk. I did not use unreasonable or excessive force against Inmate Jackson.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 23<sup>rd</sup> day of January, 2023.



RANDY L. PRITCHETT

# Cuyahoga County Sheriff's Office Correction Center Training Report

**Employee Name: Pritchett, Randy**

**Sort Order: Emp Name, Training Start, Training Type**

## Training Type

Inmate Abnormal Behavior: The Officer's Responsibility	<u>Employee Name</u>	<u>Training Date</u>	<u>Hours</u>	<u>Instructor</u>
Interpersonal Communications	Pritchett, Randy	7/8/2008	1.5	corrections article-mental health
Subject Control Techniques	Pritchett, Randy	7/22/2008	1.5	Wurvey/McArthur
	Pritchett, Randy	8/5/2008	1.5	Ivey
Inmate Supervision: The Role of the Correction Officer				
Fights, Riots and Disorders	Pritchett, Randy	8/19/2008	1	corrections article-gangs
	Pritchett, Randy	11/30/2008	0.5	Schwartz
Use of Force				
Body Searches: Clothed and Unclothed	Pritchett, Randy	12/7/2008	0.5	Schwartz
Subject Control Techniques	Pritchett, Randy	12/21/2008	0.75	Schwartz
	Pritchett, Randy	1/4/2009	0.5	Schwartz
Report Writing				
Subject Control Techniques	Pritchett, Randy	1/11/2009	1	Schwartz
	Pritchett, Randy	1/13/2009	2	Ivey
CPR				
Subject Control Techniques	Pritchett, Randy	3/9/2009	1.5	Matejka
	Pritchett, Randy	3/16/2009	1	Schwartz
Subject Control Techniques				
	Pritchett, Randy	3/17/2009	1.5	Schwartz
Subject Control Techniques				
	Pritchett, Randy	5/11/2009	1.25	Broeckel

## Total Hours



Friday, February 11, 2022

**Employee Name: Pritchett, Randy****Sort Order: Emp Name, Training Start, Training Type**

<u>Training Type</u>	<u>Employee Name</u>	<u>Training Date</u>	<u>Hours</u>	<u>Instructor</u>
subject Control Techniques	Pritchett, Randy	5/23/2013	1	J.Kelley
Basic Security Duties	Pritchett, Randy	7/18/2013	7	Kelley
cell and Living Area Searches	Pritchett, Randy	8/15/2013	6	J.Kelley
subject Control Techniques	Pritchett, Randy	8/15/2013	1	J.Kelley
Sexual Harassment and Abuse in Corrections	Pritchett, Randy	11/12/2013	2	Dan Clark
First Aid	Pritchett, Randy	2/10/2015	1	E. METZ (Dawn Program)
Suicide Prevention: Detection, Interventions and Response	Pritchett, Randy	8/30/2015	1	On-Line Training CCJ
Fire Safety	Pritchett, Randy	3/13/2016	2.5	J.Kelley
Interpersonal Communications	Pritchett, Randy	5/1/2016	1	National Institute of Correction
Fire Safety	Pritchett, Randy Louis	6/12/2016	1	Sgt. Torey
Body Searches: Clothed and Unclothed	Pritchett, Randy Louis	3/17/2018	0.6	D.Malejka
Subject Control Techniques	Pritchett, Randy Louis	4/1/2018		Sean Potts
Training Overview and Orientation	Pritchett, Randy Louis	12/3/2018	0.17	Sgt. Branch
Interpersonal Communications	Pritchett, Randy Louis	12/4/2018	0.17	D.Branch
Telephone Etiquette				

**Total Hours**

Friday, February 11, 2022



# **SAFETY**

**RESTRAINT CHAIR INC.**

This certificate recognizes that

**RANDY PRITCHETT**

has completed and passed the Restraint Training Test and is certified to operate the Safety Restraint Chair.

Certificate Valid Until:  
**12/9/2022**

Agency Name: **Cuyahoga County Sheriff Dept.**  
City / State: **Cleveland / Ohio**

**SAFETY RESTRAINT CHAIR INC.**  
[www.restraintchair.com](http://www.restraintchair.com)







CUYAHOGA COUNTY  
SHERIFF'S DEPARTMENT  
-TRAINING DIVISION-

# CERTIFICATE OF TRAINING

This is to certify that

*Randy Pritchett*

Has successfully completed

**CORRECTIONS OFFICER SAFETY  
& LIABILITY AWARENESS**

Instructors:

A handwritten signature in black ink, appearing to read "T. O'Connor".

Sgt. Timothy O'Connor

Date: July 2, 2019





## *Certificate of Completion*

*RANDY PRITCHETT*

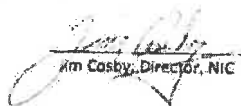
*has completed the online course*

*Creating and Maintaining a Positive Work Environment*

*Presented by the National Institute of Corrections*

*on May 1, 2016 with a score of 81%*

*Training hours: 1*

  
Jim Cosby, Director, NIC



## ***Certificate of Completion***

***RANDY PRITCHETT***

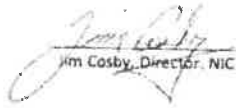
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*Training hours: 1*

  
Jim Cosby, Director, NIC

**EMERGENCY CARE AND TRANSPORTATION OF AN INMATE****SRT SKILL DRILL 011-012**

- Task:**
1. Place a cervical collar on a patient
  2. Place the patient on a long backboard.
  3. Secure the patient and long backboard on a stretcher.
  4. Ensure the stretcher is in a ready to move state.

**Conditions:** In a controlled environment and while given a cervical collar, long backboard, and stretcher correctly apply the C-collar, immobilize a patient to a long backboard, secure the long backboard with patient to a stretcher, and lift the stretcher.

**Standards:** Correctly apply the cervical collar, Properly immobilize a patient to a long board, properly secure the patient to a stretcher and ensure the stretcher is ready for movement.

**SRT OFFICER:** R. Pritchett

**DATE:** 01-11-16

**Cervical Collar**

NO.	Task Steps	Test Comments	Pass	Fail
1.	Apply in-line stabilization.	DISPLAYED UNDERSTANDING OF IN-LINE STABILIZATION TASK COMPLETED	✓	
2.	Measure the proper collar size.	TASK COMPLETED	✓	
3.	Place the chin support first.	APPROPRIATELY COMPLETED TASK	✓	
4.	Wrap the collar around the neck and secure the collar.	APPROPRIATELY COMPLETED TASK	✓	
5.	Ensure proper fit and maintain neutral, in-line stabilization.	TASK COMPLETED	✓	



## EMERGENCY CARE AND TRANSPORTATION OF AN INMATE

## SRT SKILL DRILL 011-012

- Task:** 1. Place a cervical collar on a patient  
 2. Place the patient on a long backboard.  
 3. Secure the patient and long backboard on a stretcher.  
 4. Ensure the stretcher is in a ready to move state.

**Conditions:** In a controlled environment and while given a cervical collar, long backboard, and stretcher correctly apply the C-collar, immobilize a patient to a long backboard, secure the long backboard with patient to a stretcher, and lift the stretcher.

**Standards:** Correctly apply the cervical collar, Properly immobilize a patient to a long board, properly secure the patient to a stretcher and ensure the stretcher is ready for movement.

SRT OFFICER: R. PATCHETT

DATE: 1-11-16

**LONG BACKBOARD & STRETCHER**

NO.	TASK	TEST COMMENTS	PASS	FAIL
1.	Rescuers kneel on one side of the patient and place hands on far side of the patient.	TASK COMPLETED	✓	
2.	On command, rescuers roll the patient towards themselves, quickly examine the back, slide the backboard under the patient, and roll the patient onto the backboard.	TASK APPROPRIATELY COMPLETED	✓	
3.	Center the patient on the board.	TASK COMPLETED	✓	
4.	Secure the upper torso first.	TASK COMPLETED	✓	
5.	Secure the chest, pelvis and upper legs.	TASK COMPLETED	✓	
6.	Begin to secure the patient's head by using a commercial immobilization device or rolled towels.	APPROPRIATELY COMPLETED TASK	✓	

## EMERGENCY CARE AND TRANSPORTATION OF PATIENTS

SRT OFFICER: R. FRITCHETTDATE: 1-11-16**CONTINUE LONG BACKBOARD & STRETCHER**

NO.	TASK	TEST COMMENTS	PASS	FAIL
7.	If needed place tape across the patient's forehead	TASK COMPLETED	✓	
8.	Check all straps and readjust as needed. Reassess distal functions in all extremities.	TASK COMPLETED	✓	
9.	On command pick up the patient and long backboard and place it on a stretcher.	TASK COMPLETELY APPROPRIATELY	✓	
10.	Using the straps provided on the stretcher secure the patient and on command lift the stretcher (placing the stretcher in a ready to move state).	TASK COMPLETED	✓	

Instructor: RAYMOND JONTONYInstructor Signature: [Signature]



PepperBall

# PEPPERBALL TECHNOLOGIES

## User Certification Certificate

*This is to certify that*

**OFFICER RANDY PRITCHETT**

*Of the*

**CUYAHOGA COUNTY SHERIFF DEPARTMENT**

*Has successfully completed the PepperBall Technologies User Certification Course*

Instructor: SGT. JOSEPH B. KELLEY

Date: JULY 18, 2013

CUYAHOGA COUNTY SHERIFF'S OFFICE

FILE NO. \_\_\_\_\_

DATE

10/20/13

FROM SRT OFC.

TO SGT. KELLEY

SUBJECT POST OPRDERS

COPIES TO AWIVEY

I OFC. Pritchett Randy HAVE READ AND UNDERSTAND THE SRT  
POST ORDERS AS WELL AS THE FOLLOWING POLICIES AND PROCEDURES;

Incident Reporting and Investigation

Response to Resistance

Use of Video Recording Equipment/Emergency Response

Use of Video Recording Equipment in Disciplinary Unit

Securing The Property of Inmates in Disciplinary Isolation

Chemical Agents Policy

Cell Extraction

Correction Officers Manual of Instructions and Directions

Randy Pritchett 10/20/13  
Sign and Date



***PepperBall Technologies, Inc.***

# **PepperBall Technologies, Inc.**

## **USER CERTIFICATION**

*This is to certify that*  
**Randy Pritchett**

*Of the*  
**Cuyahoga County Sheriff**

**Has successfully completed a PepperBall Training Course  
on 5/3/2011 at the location of Mock Prison Riots**

**Robert Baldwin**

**Robert Baldwin, Instructor**

**Monte Scott**

**Monte Scott, Director of Training**

**Expires on 5/3/2013**

***PepperBall Technologies, Inc.***

# **PepperBall Technologies, Inc.**

## **USER CERTIFICATION**

*This is to certify that*  
**Randy Pritchett**

*Of the*  
**Cuyahoga County Sheriff**

**Has successfully completed a PepperBall Training Course  
on 5/3/2011 at the location of Mock Prison Riots**

**Robert Baldwin**  
Robert Baldwin, Instructor

**Monte Scott**  
Monte Scott, Director of Training  
Expires on 5/3/2013



**THE MONADNOCK PR-24®  
CERTIFICATE OF COMPETENCY  
PR-24 ADVANCED COURSE**

This is to verify that

**Randy L. Pritchett**

has been properly trained in the uses and concepts of the  
MONADNOCK PR-24® POLICE BATON AND CONTROL DEVICES.

No. **2001-02**

Date Certified **11/20/01**

*[Signature]*  
Certified Instructor

MONADNOCK POLICE TRAINING COUNCIL, INC., FITZWILLIAM, NH 03447

**CUYAHOGA COUNTY SHERIFF'S DEPARTMENT**

**Gerald T. McFaul, Sheriff**

*This is to Certify that*

**RANDY PRITCHETT**

*Has successfully completed the  
Correction Officer Basic 120 Hour Training  
compliant with Section 5120: 1-8-18 (D-1,2) of the  
Minimum Jail Standards in Ohio  
on this day, Friday, May 8, 1998*

*Gerald T. McFaul*  
Gerald T. McFaul  
Sheriff, Cuyahoga County

*Robert B. Pace*  
Robert B. Pace  
Director of Corrections

County 0001655

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



# CUYAHOGA COUNTY SHERIFF'S OFFICE

A

## COMBINATION REPORT

FILE# 012043

☒ INCIDENT☒ RESPONSE TO INCIDENT☒ DISCIPLINARY

(PLEASE CHECK OFF THE APPROPRIATE BOX(ES) DESIGNATING THE REPORT TYPE)

DATE: 12/10/2018

DAY: MONDAY

Page: 1 of 1 Pages

REPORTING OFFICER: KIMBERLY BROWN-WIGGINS

NAME OF PERSONS INVOLVED: 3C8B SULEIMAN, FATIMA S0#0273933 BK# 20181210037  
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SOR)

2C1 4T JACKSON, TABITHA S0#0167552 BK# 20181026046

NAME OF PERSON CHARGED: 3C8B SULEIMAN, FATIMA S0#0273933 BK#20181210037  
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SOR and BOOKING#)

DATE OF INCIDENT: 12/10/2018

DAY OF INCIDENT: MONDAY

TIME OF INCIDENT: 1500HRS

LOCATION OF INCIDENT: MAIN MEDICAL

### NARRATIVE: (WHO, WHAT, WHERE, WHEN, WHY, HOW & ACTION TAKEN)

AT ABOUT 1455 HOURS I OFFICER BROWN-WIGGINS WAS ATTEMPTING TO HAVE THE NURSING STAFF DO INTAKE ON THE ELEVEN NEW COMMITTEE INMATES THAT HAD BEEN WAITING IN THE BULLPEN FOR OVER AN HOUR. AT THIS TIME MTA MCQUEEN RETURNED FROM LUNCH AND BEGAN TO INTAKE THE FEMALES WAITING. AS I SAT BACK DOWN AT THE MEDICAL ESCORT DESK I BEGAN TO HEAR THE NOISE LEVEL IN THE BULLPEN RISE. AS I OFFICER BROWN-WIGGINS WALKED OVER TO THE BULLPEN I OBSERVED INMATE 3C8B SULEIMAN, FATIMA S0#0273933 TAKE HER RIGHT HAND AND SLAP INMATE 2C1 4T JACKSON, TABITHA S0#0167552 IN THE FACE. 2C1 JACKSON, T PUT HER HANDS UP TO BLOCK HER FACE AND ATTEMPTED TO MOVE BACK FROM INMATE 3C SULEIMAN, F. INMATE SULEIMAN THEN BALLED HER FIST UP AND HIT INMATE 2C1 JACKSON IN THE FACE AGAIN AS JACKSON WAS ATTEMPTING TO GET AWAY FROM HER. THE BULLPEN DOOR WAS OPEN AND AS MYSELF AND OFFICER MUSZYNEC CAME IN AND ATTEMPTED TO SECURE BOTH INMATES. INMATE 3C SULEIMAN, F CONTINUED TO TRY AND GET INMATE JACKSON. AT THIS TIME INMATE JACKSON GRABBED INMATE SULEIMAN AND STARTED TO HIT HER IN THE FACE. OFFICER DIRECTED JACKSON TO LET GO AND INMATE JACKSON DID SO. INMATE SULEIMAN CONTINUED TO ATTEMPT TO GET PAST ME. ONCE SULEIMAN WAS SECURED IN HANDCUFFS I OFFICER BROWN-WIGGINS THEN SECURED INMATE JACKSON IN HANDCUFFS. AT THIS TIME CPL. PRITCHETT RESPONDED AND TOOK OVER THE SITUATION.

EXHIBIT

2

tabbles



County 0001656

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



# CUYAHOGA COUNTY SHERIFF'S OFFICE

WAS THERE A RESPONSE TO RESISTANCE? ☐ NO ☒ YES

IF YES, NARRATIVE OF RESPONSE USED: Response to Resistance necessary  
to secure inmate Jackson's hands in handcuffs

RESPONSE TO RESISTANCE REVIEWED: [Signature]

☐ MINOR RULE(S) VIOLATION DISPOSITION REQUESTED (Not to exceed 120 hours)

CHARGES:

☒ MAJOR / SERIOUS RULE(S) VIOLATION REQUESTED

CHARGES:

2-2 2-19

FLOOR / AREA SUPERVISOR'S REVIEW: Both inmates were seen in Medical, inmate  
Jackson vitals were checked by Nurse Zitello returned back to her housing unit.  
Reviewed Jackson previously in lockup 2-19-18. Inmate Sullivan was seen by DR.

Francis and was order by DR Francis to send inmate to Metro by EMS due to facial  
injuries. EMS MID. Deputy C. St. - Inmates - Brown & Veolia 10:30. Was placed in inmate  
REQUEST FOR DISCIPLINE, IF APPLICABLE, HAS BEEN REVIEWED & FORWARDED TO THE SGT FOR FURTHER ACTION?

☒ YES ☐ NO

ALL SEGMENTS OF THIS REPORT ARE COMPLETE?

☒ YES ☐ NO

Cpl. R. [Signature]  
(FLOOR / AREA SUPERVISOR'S SIGNATURE)

☐ MINOR RULE VIOLATION DISPOSITION APPROVED:

☐ YES

☐ NO

DISCIPLINARY ISOLATION START:

@

☐ AM

☐ PM

END:

@

☐ AM

☐ PM

☒ REQUEST FOR MAJOR / SERIOUS DISCIPLINE HAS BEEN REVIEWED & APPROVED FOR FURTHER INVESTIGATION  
AND APPROPRIATE ADMINISTRATIVE ACTION? ☒ YES ☐ NO

REPORT REVIEWED AND APPROVED:

☒ YES

☐ NO

SERGEANT'S REVIEW:

both inmates placed in lockup  
lock up for resisting handcuffs

SERGEANT'S SIGNATURE:

[Signature]

DATE:

12/10/18

EXHIBIT

2

tabbles

County 0001653

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



**CUYAHOGA COUNTY SHERIFF'S OFFICE**  
**Clifford Pinkney, Sheriff**

A

**COMBINATION REPORT**FILE # 012044☒ INCIDENT☒ RESPONSE TO INCIDENT☒ DISCIPLINARY

(PLEASE CHECK OFF THE APPROPRIATE BOX(ES) DESIGNATING THE REPORT TYPE)

DATE: 12-10-18DAY: MondayPage: 2 of 1 PagesREPORTING OFFICER: Moszyk NancySIGNATURE: [Signature]NAME OF PERSONS INVOLVED: 3088 Sullivan Fatima 273983 - 201810087  
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SOI)Tabithe 167552 - BK# 20181026046NAME OF PERSON CHARGED: 201-4T JACKSON Tabithe 167552 BK# 20181026046  
3088 Sullivan Fatima 273983 201810087  
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SOI and BOOKING#)DATE OF INCIDENT: 12-10-18DAY OF INCIDENT: MondayTIME OF INCIDENT: 1500 HrsLOCATION OF INCIDENT: Main Hallway

NARRATIVE: (WHO, WHAT, WHERE, WHEN, WHY, HOW &amp; ACTION TAKEN)

December 10 2018 at 1500 hrs I assisted Officer  
Brown Wiggins with a altercation between 3088 Sullivan  
Fatima 273983 and 201-4T Jackson Tabithe 167552 and  
placed handcuffs on Jackson Tabithe 167552 after  
the altercation was under control

1.

EXHIBIT

3

tabbies



County 0001654

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



**CUYAHOGA COUNTY SHERIFF'S OFFICE**  
**Clifford Pinkney, Sheriff**

BKG.

WAS THERE A RESPONSE TO RESISTANCE? ☐ NO ☒ YES

IF YES, NARRATIVE OF RESPONSE USED:

Response to Resistance necessary  
to secure inmate 3C38 SILEMAN FATHMA 273953-2018100437  
 RESPONSE TO RESISTANCE REVIEWED: [Signature]

☐ MINOR RULE(S) VIOLATION DISPOSITION REQUESTED (Not to exceed 120 hours)

CHARGES:

☒ MAJOR / SERIOUS RULE(S) VIOLATION REQUESTED

CHARGES:

2-2

2-19

FLOOR / AREA SUPERVISOR'S REVIEW:

Response to Resistance Report.

REQUEST FOR DISCIPLINE, IF APPLICABLE, HAS BEEN REVIEWED & FORWARDED TO THE SGT FOR FURTHER ACTION?

☒ YES ☐ NO

ALL SEGMENTS OF THIS REPORT ARE COMPLETE?

☒ YES ☐ NO

Cpl. [Signature]  
 (FLOOR / AREA SUPERVISOR'S SIGNATURE)

☐ MINOR RULE VIOLATION DISPOSITION APPROVED:

☐ YES

☐ NO

DISCIPLINARY ISOLATION START:

@

☐ AM ☐ PM

END:

@

☐ AM ☐ PM

☒ REQUEST FOR MAJOR / SERIOUS DISCIPLINE HAS BEEN REVIEWED & APPROVED FOR FURTHER INVESTIGATION AND APPROPRIATE ADMINISTRATIVE ACTION? ☐ YES ☐ NO

REPORT REVIEWED AND APPROVED:

☐ YES

☐ NO

SERGEANT'S REVIEW:

[Signature] 5/20/18

SERGEANT'S SIGNATURE:

[Signature]

DATE:

12/10/18

3.

